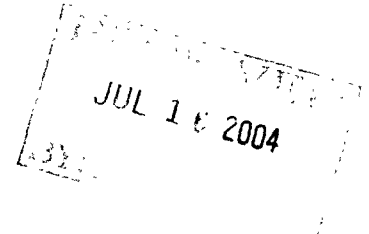


SPIRIT SCIENCES USA, INC
6733 S. Sepulveda Blvd., Suite 108,
Los Angeles, CA 90045
TEL: (310) 568-1030 FAX: (310) 861-5612
www.spirit-sciences.com

July 9, 2004



Susan J. Walker, M.D.
Director
Division of Dietary Supplement Programs
Office of Nutritional Products,
Labeling and Dietary Supplements (HFS-800)
Room No. 4D042
Center for Food Safety and Applied Nutrition
Food And Drug Administration
200 C Street SW
Washington, DC 20204

Reference: *Dietary Supplement Notification Pursuant to 21 C.F.R. § 101.93*
Product: *RU-21*
FDA Registration #: *17007788334*

Dear Dr. Walker:

This notification is being submitted in triplicate on behalf of Spirit Sciences USA, Inc., who is the distributor of the product which bears the statements identified in this notification.

Pursuant to 21 Code of Federal Regulations Section 101.93, Spirit Sciences USA, Inc., hereby notifies the Food and Drug Administration that they intend to market RU-21, a dietary supplement product, with labeling bearing statements provided for in 21 U.S.C. § 343(r)(6), section 403(r)(6) of the Federal Food, Drug, and Cosmetic Act.

PRODUCT NAME: Spirit Sciences USA, Inc.'s "RU-21®"

DISTRIBUTED BY: Spirit Sciences USA, Inc.
6733 S. Sepulveda Blvd., Suite 108
Los Angeles, CA 90045

MANUFACTURED BY: AMK Market
Dnepropetrovskaya 3/5

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Spirit Sciences requests written notification prior to public release of this document.

Moscow, Moskva 113587
RUSSIAN FEDERATION

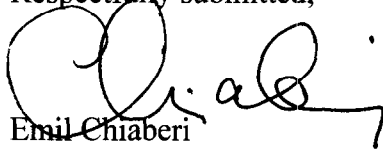
DIETARY INGREDIENTS: succinic acid,
 fumaric acid,
 L-glutamine,
 vitamin C, and
 glucose (dextrose)

STATEMENTS OF
NUTRITIONAL SUPPORT: *Promotes morning energy
 *Supports health and vitality
 *Supports the body's natural ability to metabolize alcohol

I, Emil Chiaberi, am authorized to certify this notification on behalf of Spirit Sciences USA, Inc. I certify that the information presented and contained in this notification is complete and accurate and that Spirit Sciences USA, Inc. has substantiation that each statement of nutritional support is truthful and not misleading.

Please review the above information and submit this notification to the Spirit Sciences USA, Inc. file. Should you have any questions or concerns, please contact me at (310) 568-1030 x202.

Respectfully submitted,



Emil Chiaberi
Chief Executive Officer
Spirit Sciences USA, Inc.

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Confidential Under 21 C.F.R § 20.61

Spirit Sciences requests written notification prior to public release of this document.